



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, OH 44087-1924

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Laura H. Powell, Acting Director

January 9, 2007

RE: 9150 GROUP, L.P.
SUMMIT COUNTY
OHD 050 387 802
UNPERMITTED TSDF
NOTICE OF VIOLATION

Mr. Larry Albright Sr., Statutory Agent
9150 Group, L.P.
7753 Red Fox Trail
Hudson, OH 44236-1927

CERTIFIED MAIL

RE: GROUNDWATER MONITORING NOV, HAZARDOUS WASTE NOV, CRO NOV

Dear Mr. Albright:

The Ohio EPA Division of Hazardous Waste Management (DHWM) conducted its annual compliance inspections of your facility (OHD 050 387 802) located at 9150 Valley View Road in Macedonia (Facility). The inspection was conducted by me and Kris Coder, DHWM on December 15, 2006. Mr. Frank Libby represented the Facility. This report lists the current understanding of violations and concerns that have been identified from inspections at your Facility. This Facility is also known as Aerosol Systems, ASI, Specialty Chemical Resources and/or Hi-Port Aerosol in Macedonia, Ohio.

These inspections are conducted annually as a result of the Facility being subject to the closure and post-closure care requirements in rules 3745-55-10 to 3745-55-20 or 3745-66-10 to 3745-66-20 of the Ohio Administrative Code (OAC). Further, the 9150 Group was regulated under Ohio's Cessation of Regulated Operations (CRO) laws and rules as found under Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the OAC. As the owner of the Facility, the 9150 Group is subject to these requirements.

This letter serves as a **NOTICE OF VIOLATION** for cessation of regulated operation and hazardous waste rules and a **NOTICE OF VIOLATION** for groundwater monitoring rule violations. This letter contains additional violations and issues (See violations #1.5. and #8).

CRO AND HAZARDOUS WASTE VIOLATIONS

1. Waste Evaluation OAC 3745-52-11 and Removal of Regulated substances, ORC § 3752.06(A)(5) and OAC 3745-352-20(A)(2)(C):

1. Mercury contamination - Dirt and concrete dust/debris identified to be mercury containing during the CRO effort was **reported** collected and sent offsite. Ohio EPA's screening on August 25, 2004, indicated levels of mercury exceeding 100ug/m³ (micrograms per cubic meter of air) in debris in the west gas house area. Documentation of your cleanup and disposal from the former west gas house area has not been received.

To abate this violation, provide documentation of proper removal, cleanup and disposal of mercury contaminated debris with verification of proper floor cleanup and/or encapsulation in the former west gas house area.

2. Solvent Contamination in Pipe Trench - Backfill in an outdoor concrete pipe trench at the former pump house was contaminated by solvent releases that occurred during the CRO effort. On June 14, 2005, Mr. Libby reported this contamination was 1,200 parts per million (ppm) for 1,1,1 trichloroethane.

To abate this violation, provide documentation of waste evaluation, cleanup and proper disposal of all contaminated soil, gravel and water within the trench and western tank containment. Provide analytical data and waste disposal manifests.

3. Solvent Contaminated Containment Water - The contaminated trench backfill material is connected via a pipe to the western tank farm dike area. This has contaminated the diked water via the pipe connection. Water in the western-most containment appears contaminated. The water of the western containment should not be discharged until analytical results determine the proper method of disposal. Note also that the Macedonia Fire Department has requested, on several occasions, that the water of the containments be permanently emptied due to the hazard posed.

To abate this violation, provide documentation of waste evaluation and proper disposal of the contaminated water either to an approved sanitary connection or a waste hauler. Thoroughly clean the trench, pipe and containment dike and permanently plug, cap, grout or breach all containment features unless a use can be demonstrated. Provide Ohio EPA with all analytical data, verification of cleanup, decommissioning and disposal manifests.

4. Solvent Contaminated discharge from Connecting Pipe - Discharge of contaminated storm water occurs from a pipe connection between the dike and the pipe trench. This area needs to be investigated to determine the appropriate remedial action.

To abate this violation, provide documentation of subsurface and surface sampling in the vicinity of this pipe connection. Properly remove and dispose all contaminated soil and piping. Provide Ohio EPA with all analytical data, verification of cleanup, decommissioning and disposal manifests.

5. Waste fluid in abandoned 55- gallon drum – There is a full drum on the north side of the Facility along with solid waste that has been noted present from drive through inspections for many months.

To abate this violation, this drum needs to be evaluated, properly labeled, managed and sent for proper disposal. Provide waste evaluation, labeling, storage and disposal documentation that demonstrates the abandoned drums fluid contents has been properly managed and disposed.

3. Hazardous Waste Requirements OAC 3745-352-20 (A) (2) (G) and OAC 3745-66-10 to 66-20 Closure and post-closure care:

Since 1991, at least six (6) indoor generator accumulation units and at least seven (7) other outside areas have been identified that require closure.

To abate this violation, these units and outside areas will need to be closed in compliance with the regulations and the Facility closure plan. Repair, upgrade and/or modification of the soil and groundwater treatment system or modification of the closure plan is required.

4. 90-day Notification to the Director, ORC § 3752.06(A)(6) and OAC 3745-352-20(A)(2)(h):

Not all substances have been demonstrated removed as indicated by the items of Violation #1 above. The 90-day form with attached information was provided prior to satisfactory completion of the CRO effort.

To abate this violation, Ohio EPA requires additional information as identified in sections following Violation #1 above to ensure all CRO substances have been properly removed from the Facility. Then update and resubmit the CRO 90-day notification form.

GROUNDWATER VIOLATIONS

- 5. OAC Rule 3745-65-93(D)(4):** 9150 Group is required to conduct a Ground Water Quality Assessment Program in accordance with OAC 3745-65-93 (D) and to specifically determine the rate, concentration, and extent of migration of hazardous waste or hazardous waste constituents in the groundwater as required by OAC 3745-65-93 (D)(4)(a) and (b).

The full rate, concentration and extent of migration of hazardous waste or hazardous waste constituents in the ground water has not been determined.

Ohio EPA will enforce this violation until satisfied that rate, concentration and extent of hazardous constituents in the ground water have been delineated.

- 6. OAC Rule 3745-65-93(D)(7)(a):** The 9150 Group is required to make quarterly determinations of groundwater quality in accordance with this rule until final closure of the Facility.

Consistent quarterly groundwater sampling has not been performed since the September 1999 groundwater monitoring event. The Supplemental Annual Report for 1999 submitted by Aerosol does not contain 4th quarter groundwater monitoring data. **About 26 quarters of groundwater monitoring have been missed since this time.** The 9150 Group performed a groundwater monitoring event in November of 2004 and provided results in February 28, 2005. The 9150 Group has not collected and analyzed ground water samples since the November 2004 sampling event.

Ohio EPA will enforce this violation until quarterly sampling is resumed. While the historic violations cannot be specifically abated, to return to compliance, 9150 Group must resume the required quarterly groundwater sampling and analysis in accordance with **OAC Rule 3745-65-93(D)(7)(a)**.

- 7. OAC Rule OAC 3745-65-94(B)(2):** The 9150 Group is required to provide annually, until final closure of the facility, a report to the director containing the results of the ground water quality assessment program which include, but is not limited to, the calculated (or measured) rate of migration of hazardous waste or hazardous waste constituents in the ground water during the reporting period.

An annual groundwater report has not been provided since 1999. The annual groundwater report is due March 1st of each year.

To respond to this violation, this annual report must be submitted. The appropriate annual report form may be found at: <http://www.epa.state.oh.us/dhwm/annualreport/65ANN04arial.pdf>. If you have questions regarding completion of the annual report you may contact Diane Kurlich at (330) 963-1150 or at Diane.Kurlich@epa.state.oh.us.

8. **OAC Rule 3745-65-91:** states that all monitoring wells must be cased in a manner that maintains the integrity of the monitoring well bore hole and that the annular space above the sampling depth must be sealed to prevent contamination of samples and the ground water.

There are at least two well covers that were missing from within the Geis parking area at the time of the inspection. The well-head areas were filled with silt and debris covering the well-head. Other wells and associated extraction piping were damaged during Geis parking lot renovation efforts.

To respond to this violation, the well-head areas must be cleaned out and the well caps tightly installed. The well covers should be repaired or replaced using bolt down covers. Damaged remediation system piping need repaired, replaced or capped. Provide a photograph that shows the well covers and piping have been properly repaired or replaced. Identify to OhioEPA by well identification number, all monitoring wells that required repair.

CONCERNS

10. Ground Water

In November 2004, the 9150 Group completed one quarter of ground water monitoring. The results of the November 2004 sampling indicate that:

- volatile contaminant concentrations have increased dramatically in some wells;
- there are 12 wells in which concentrations equal or exceed MCL's;
- some of these high concentrations are at the 9150 Group property boundary;
- groundwater contamination appears to be moving offsite;
- the groundwater recovery system should be reactivated to reverse/reduce this trend;
- elevated VOCs near the former propellant and above-ground solvent tank farms indicate possible source areas that appear to require further investigation and directed remedial efforts;
- high pH values in SMW-8/UZ-7 and DMW-9A should be evaluated to determine if it has had an effect on sample validity;
- well DZ-1 could not be sampled.

14. Geis Paving Project Issues

The Geis Companies initiated a repaving project adjacent to the 9150 Facility. Drainage ditching of this project appears to have inadvertently intersected the 9150 Group treatment system piping along the property boundary. Note the following concerns:

- The piping connected to several wells located on Geis Property is in need of repair, replacement, or proper decommissioning.
- The groundwater treatment system is part of an approved closure plan. Ohio EPA recommends that repairs or piping upgrades be made so that the system may be operated to satisfy closure requirements. Closure plan modification may be required.
- Damage or disturbance to these lines may have created a pathway or caused discharge to the wells. This must be evaluated and corrected immediately to restore serviceability of the wells.

CONSENT ORDER

Please be advised that the 9150 Group, as owner of the Facility, may be in contempt of the Consent Order entered into between Aerosol Systems, Inc. and the State of Ohio [State of Ohio v. Aerosol Systems, Inc., et al., Case No. CV-884-10145 (Summit County Court of Common Pleas, July 9, 1990)].

Ohio EPA reserves the right, pursuant to ORC Chapters 3734 and 6111 and any other applicable state and federal laws or regulations, to require further Facility-wide investigation and remediation to address any unpermitted releases of hazardous waste, hazardous substances, industrial wastes, pollutants, and or contaminants into the environment, including groundwater.

Additional violations and/or deficiencies which may exist pertaining to **closure, financial assurance and liability, compliance monitoring inspections, etc.**, have not been considered in this letter.

Please submit the requested documentation, to my attention, within **30 days** of receipt of this letter. Enclosed is a CRO Checklist completed for this inspection. Should you have any questions, please feel free to contact me at (330) 963-1146.

Sincerely,



Ronald J. Shadrach
Environmental Specialist
Division of Hazardous Waste Management

RJS:ddw

Enclosure

ec: Frank Popotnik, DHWM, NEDO
John Palmer, DHWM, NEDO
Diane Kurlich, DDAGW, NEDO
Frank Libby, site contact
cc: Ralph McGinnis, DHWM, CO
Brian Ball, EES, AGO
Isaac Wilder, DHWM, CO
Frank Posar, Fire Inspector

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

9150 Group, L.P.
9150 Valley View Road
Macedonia, Ohio

CESSATION OF REGULATED OPERATIONS CHECKLIST

<input checked="" type="checkbox"/> Permanent Cessation	<input type="checkbox"/> Temporary Discontinuation	<input type="checkbox"/> Requesting Waiver for Temporary Discontinuation
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Company: 9150 Group, L.P. EPA ID#: OHD 050 387 802

Street: 9150 Valley View Road City: Macedonia

County: Summit State: Ohio Zip: 44056

Mailing Address: 7753 Red Fox Trail, Hudson, OH 44236-1927
(If different from above)

Telephone Number: _____ Fax Number: _____

Owner/Operator: Larry Albright, Statutory Agent

Street: 7753 Red Fox Trail City: Hudson

County: Summit State: Ohio Zip: 44236-1927

Telephone Number: _____ Fax Number: _____

Contact Person: Frank Libby

Street: _____ City: Hudson

County: Summit State: Ohio Zip: _____

Telephone Number: 330-388-4367 Fax Number: _____

If the following applies, check the appropriate box and provide information:

<input type="checkbox"/> Holder of First Mortgage	<input type="checkbox"/> Fiduciary	<input type="checkbox"/> Receiver	<input type="checkbox"/> Indenture Trustee
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Name : _____

Street: _____ City: _____

County: _____ State: _____ Zip: _____

Telephone Number: _____ Fax Number: _____

Inspection Date(s): December 15, 2006 Time(s): 9:00 AM

Inspection Announced: YES NO If so, how much advance notice given?: 2 weeks

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone Number</u>
Inspectors:	<u>Ron Shadrach</u>	<u>Ohio EPA, NEDO, DHWM</u>	<u>330-963-1146</u>
	<u>Kris Coder</u>	<u>Ohio EPA, NEDO, DHWM</u>	<u>330-963-1200</u>
Facility Rep(s)	<u>Frank Libby</u>	<u>9150 Group Rep</u>	<u>330-388-4637</u>
	<u>Chuck</u>	<u>Darko Foreman</u>	

30-DAY REQUIREMENTS

1. Did the owner/operator of the reporting facility submit a notice of the cessation of all regulated operations (CRO) on a form prescribed by the Director to the following within 30 days of CRO? [ORC 3752.04 and OAC rule 3745-352-20(A)(1)(a)]
- a. Director of Ohio EPA Yes ___ No X N/A ___ RMK# 1.
- b. Local Emergency Planning Committee Yes ___ No X N/A ___ RMK# 1.
- c. Local Fire Department Yes ___ No X N/A ___ RMK# 1.
2. Did the owner/operator designate a contact person? [ORC §3752.05 and OAC rule 3745-352-20(A)(1)(c)] Yes X No ___ N/A ___ RMK# 1.
3. Did the owner/operator include the following information about the contact person? [ORC §3752.05(B) and OAC rule 3745-352-35(B)] Yes X No ___ N/A ___ RMK# _____
- a. Address of principal office of the owner/operator. Yes X No ___ N/A ___ RMK# 2.
- b. Business or residence address. Yes X No ___ N/A ___ RMK# _____
- c. Telephone number of contact person. Yes X No ___ N/A ___ RMK# _____
4. Has the contact person changed? [ORC §3752.05(C) and OAC rule 3745-352-35(D)] Yes X No ___ N/A ___ RMK# _____
5. If the contact person changed his/her address or telephone numbers, did the owner/operator or contact person provide the Director with the new address or telephone number? [ORC §3752.05(D) and OAC rule 3745-352-35(D)] Yes X No ___ N/A ___ RMK# _____

NOTE: The owner/operator is also required to secure the facility and post warning signs within 30 days of CRO. See pp 5-6 of this checklist.

REMARKS

1.-2. No further action required at this time.

90-DAY REQUIREMENTS [ORC §3752.06]

1. Did the owner/operator make a written certification to Ohio EPA's Director concerning the completion of the removal action within 90 days after CRO? [ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(h)] Yes No N/A RMK# 3.
- NOTE:** The owner/operator may receive approval from the Director to extend the 90-day period. [ORC §3752.06(B) and OAC rule 3745-352-20(A)(3)]
2. Does the owner/operator hold a **valid** hazardous waste facility installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program? [ORC §3752.06(C) and OAC rule 3745-352-20(A)(2)(g)] Yes No N/A RMK# _____
- NOTE:** If so, the owner/operator is not subject to CRO for its hazardous waste and must instead comply with the hazardous waste requirements. Yes No N/A RMK# _____
3. Did the owner/operator submit to the Director a copy of the most recent emergency and hazardous chemical inventory form that was submitted to the State Emergency Response Commission (SERC), including a statement indicating whether any asbestos-containing materials are present at the facility? [ORC §3752.06(A)(1) and OAC rule 3745-352-20(A)(2)(a)] Yes No N/A RMK# 4.
4. Did the owner/operator submit to the Director a copy of the current hazardous chemical list or each material safety data sheet that the owner/operator is required to have on file with the SERC? [ORC §3752.06(A)(2) and OAC rule 3745-352-20(A)(2)(b)] Yes No N/A RMK# 5.
5. Did the owner/operator drain or remove all regulated substances from each stationary tank, vat, electrical transformer, and vessel and from all piping, that is to remain at the facility? [ORC §3752.06(A)(4) and OAC rule 3745-352-20(A)(2)(c)] Yes No N/A RMK# 10.
6. Did the owner/operator submit a list of every stationary tank, vat, electrical transformer, and vessel of any type that contains or is contaminated with regulated substances and that is to remain at the facility? [ORC §3752.06(A)(3) and OAC rule 3745-352-20(A)(2)(d)] Yes No N/A RMK# 7.
7. Did the owner/operator do the following?

a. Transfer the regulated substances to another facility owned or operated by the owner/operator? [ORC §3752.06(A)(4)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes___ No X N/A___ RMK# 10.

OR

b. Transfer ownership of the regulated substances to another person through sale or otherwise? [ORC §3752.06(A)(4)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes___ No___ N/A X RMK#_____

OR

c. Transfer the regulated substances off-site in compliance with applicable and appropriate waste management laws? [ORC §3752.06(A)(4)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes___ No___ N/A X RMK#_____

8. Did the owner/operator remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, and motor vehicles and rolling stock that contain or are contaminated with a regulated substance? [ORC §3752.06(A)(5) and OAC rule 3745-352-20(A)(2)(c)] Yes___ No X N/A___ RMK# 10.

9. Did the owner/operator do the following:

a. Transfer the debris, equipment, furnishings, containers, and motor vehicles and rolling stock to another facility owned and operated by the owner/operator? [ORC §3752.06(A)(5)(a) and OAC rule 3745-352-20(A)(2)(c)(i)] Yes___ No___ N/A X RMK#_____

OR

b. Transfer ownership of the debris, equipment, furnishings, containers, and motor vehicles, and rolling stock to another person through sale or otherwise? [ORC §3752.06(A)(5)(b) and OAC rule 3745-352-20(A)(2)(c)(ii)] Yes___ No___ N/A X RMK#_____

OR

c. Cause the debris, equipment, furnishings, and containers to be transported off-site in compliance with applicable and appropriate waste management laws and regulations? [ORC §3752.06(A)(5)(c) and OAC rule 3745-352-20(A)(2)(c)(iii)] Yes___ No___ N/A X RMK#_____

REMARKS

3. Notice issued prior to satisfactory completion of CRO effort.

4. - 9. No Further Action.

10. Need to provide documentation of proper cleanup and disposal of mercury related debris/waste from West Gas House, solvent contaminated trench backfill, containment water and soil area. These Areas of Concern resulted from events that occurred during the CRO effort.

Additionally, a drum of fluid waste and solid waste has been abandoned at the site in the last year. This is unrelated to CRO effort.

SECURITY & WARNING SIGNS REQUIREMENTS OF OWNER/OPERATOR [ORC §3752.07 AND OAC RULE 3745-352-30]

1. Did the owner/operator secure the facility against unauthorized entry using one or more of the following as provided in OAC rule 3745-352-30(A)(1)-(5) within 30 days of CRO?
- | | | |
|----|--|---|
| a. | Boarded, locked or used other means to secure all windows, doors and other potential means of entry? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <u>11.</u> |
| b. | Fencing? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <u>11.</u> |
| c. | Lighting and a surveillance system? | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> RMK# <u> </u> |
| d. | Guard or security service? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <u> </u> |
| e. | Notarized statement from the county sheriff's department or the local police stating that the security measures secure against unauthorized entry? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <u> </u> |
| f. | Demonstrated to the satisfaction of the Director or his/her designee that the proposed security measures secure against unauthorized entry? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> RMK# <u>11.</u> |
2. Did the owner/operator post the appropriate warning signs in the following fashion within 30 days of CRO? [ORC §3752.07(A) and OAC rule 3745-352-20(A)(1)(b)]:

- a. Prohibit trespassing and state: "The building, structure, or outdoor location of operations contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." [OAC rule 3745-352-30(B)] Yes___ No X N/A___ RMK# 12.
- b. Are warning signs posted on, or reasonable proximate to, the building, structure or outdoor location in sufficient number to alert people? [OAC rule 3745-352-30(B)] Yes___ No X N/A___ RMK# 12.
- c. Posted on, or reasonably proximate to, locations that contain ignitable regulated substances and include the language, "No Smoking?" [OAC rule 3745-352-30(B)(2)] Yes___ No X N/A___ RMK# 12.
- d. Legible from a distance of at least 25 feet? [OAC rule 3745-352-30(B)(3)] Yes___ No X N/A___ RMK# 12.
- e. Constructed to withstand weather and affixed to secure against removal? [OAC rule 3745-352-30(B)(4)] Yes___ No X N/A___ RMK# 12.
3. Are entry barrier and warning signs maintained to secure against unauthorized entry by the following measures listed below: [OAC rule 3745-352-30(C)]
- a. Inspected weekly or as agreed by the Director or his/her designee, county sheriff's department or local police department? [OAC rule 3745-352-30(C)(1)] Yes___ No X N/A___ RMK# 12.
- b. The condition is recorded in an inspection log? [OAC rule 3745-352-30(C)(2)] Yes___ No X N/A___ RMK# 12.
- c. Prompt repair or replacement after discovery of damage, lost or removed? [OAC rule 3745-352-30(C)(3)] Yes___ No X N/A___ RMK# 12.

REMARKS

11. - 12. Facility now active. Signs may be removed. However significant risk remains in ponded containment water that posing a drowning or exposure hazard. This water also appears contaminated in western diked containment.

ADDITIONAL MULTI-MEDIA QUESTIONS

If the owner/operator holds a valid hazardous waste installation and operation permit or renewal permit or has obtained a generator identification number issued under the state's hazardous waste program, the following four questions may apply.

1. If the facility has an U.S. EPA I.D. number, has or will the facility submit a *Change of Generator Activity Status* form? Yes X No¹
2. Were there any <90 day accumulation units for hazardous waste? Yes X No
- List where unit(s) were/are: Indoor and outdoor areas
- 1a) Former Drum Accumulation Area;
- 1b) Former transfer vessel & tote area
- 2) Transfer vessel & tote area
- 3) Old drum room accumulation area
- 4) Last known drum room accumulation area
- 5) Puncture Shed room and vent area
3. Did the owner/operator close his facility in a manner that: [OAC 3745-66-11]
- a. Minimizes the need for further maintenance? Yes No X N/A RMK# 13.
- b. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the groundwater, or surface waters, or to the atmosphere? Yes No X N/A RMK# 13.
- c. Complies with the closure requirements of OAC rules 3745-66-10 to 3745-66-20, 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80, 3745-68-10, 3745-68-51, 3745-68-81 and 3745-69-04? Yes No² X N/A RMK# 13.
4. During the partial and final closure periods, were all contaminated equipment, structures, and soil properly disposed of or decontaminated unless otherwise specified in OAC rules 3745-66-97, 3745-67-28, 3745-67-58, 3745-67-80 or 3745-68-10? Yes No² X N/A RMK# 13.
- a. Were generated hazardous wastes handled in accordance with all applicable requirements of Chapter 3745-52 of the Administrative Code? Yes No X N/A RMK# 13.

Every demolition of a facility requires notification to Ohio EPA or local air agency regardless of whether asbestos is involved as required by the National Emission Standard for Hazardous Air Pollutants (NESHAPS) Standard for

Asbestos. Notification requirements are found in OAC 3745-20-03 and 40 CFR §61.145(b). The notification form is available from Ohio EPA's web page at <http://www.epa.state.oh.us/dapc/atu/atu.html#asbestos>.

5. Will any buildings be demolished? If yes: Yes No
- Has a *Notification of Demolition and Renovation* form been submitted? Yes³ No⁴
6. Are there any wells on the property? Yes⁵ * No

If yes, where are the wells?

Locations of monitoring and extraction wells are identified in numerous Closure Plans and environmental assessment documents for the facility.

What are the wells used for?

The wells were originally installed for assessment, monitoring and extraction of solvent waste from soil and groundwater aquifers but have inoperative and unattended generally since late 1999.

7. Is there open dumping of solid waste on the property? Yes⁶ No

REMARKS

13. In general, during facility operation generator areas exceeded the ninety day limit and had incomplete inspection records. Releases occurred and remediation measures did not adequately address or contain the releases. Generator closure needs completed.

*** Several monitoring wells located off site have been seriously comprised and need repair to maintain integrity of the monitoring system and insure groundwater is not further compromised. This must be addressed as soon as possible.**

1. Supply the facility with the form and tell them they must submit it.
2. Supply the facility with the requirements for generator closure and tell them they must close the unit and have documentation that closure was completed (LQGs only).
3. Check with the appropriate agency to determine if a form has been received.
4. Supply the facility with a form and contact the appropriate agency stating that demolition will occur.
5. If used for drinking water, let DDAGW know about the well.
6. Let DSIWM know about the open dumping of solid waste.